



May 2, 2005

VIA ELECTRONIC DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: T-Mobile USA, Inc. E-911 Quarterly Report

Dear Ms. Dortch:

In accordance with the terms of the consent decree between T-Mobile USA, Inc. ("T-Mobile") and the Federal Communications Commission ("FCC" or "Commission") related to T-Mobile's deployment of E-911 Phase II services, T-Mobile hereby submits its May 2005 E-911 Quarterly Report ("Report").¹

Since our last Quarterly Report in February, T-Mobile has continued to make significant progress in its E-911 deployment efforts. To date, T-Mobile has deployed 1133 of the requests it has received as of April 25, 2005 for Phase I service where it has coverage. The total number of PSAPs receiving Phase I information from T-Mobile as a result of these deployments is 2510.

With respect to Phase II, T-Mobile continues to make significant deployments of its network-based Uplink-Time Difference of Arrival ("TDOA") solution for delivering Phase II location information to PSAPs.² As this work proceeds, T-Mobile continues to

¹ *In the Matter of T-Mobile, USA, Inc.*, Order, File No. EB-02-TS-012, FCC 03-172 (rel. July 17, 2003) ("T-Mobile Consent Decree").

² TDOA calculates a mobile phone's location by comparing the difference in the times at which a signal transmitted from the phone reaches three or more Location Measurement Units ("LMUs") installed in a wireless carrier's base stations.

deliver its interim Phase II Network Safety Solution (“NSS”)³ to PSAPs as required, even as it transitions those communities to TDOA. T-Mobile anticipates that it will continue to fulfill the requirements contained in its consent decree to deploy Phase II services across its markets in a timely fashion.⁴ In fact, to date T-Mobile has deployed 593 of the Phase II requests it has received as of April 25, 2005 where it has coverage, and a total of 1496 PSAP entities are currently receiving Phase II information under these deployments.

I. Phase I and Phase II Requests

Paragraph 10(a) of T-Mobile’s consent decree requires that T-Mobile provide certain information on all pending Phase I and Phase II requests it has received. **Attachment A** to this Report provides the required information. This attachment follows the standardized reporting spreadsheet the Commission stated that Tier I carriers, including T-Mobile, should include with their Quarterly Reports beginning August 1, 2003.⁵

Attachment A lists all PSAPs covered by requests for Phase I and/or Phase II service received by T-Mobile as of April 25, 2005.⁶ T-Mobile has indicated which requests have been deployed and the dates of deployments (note that in a number of cases T-Mobile has deployed Phase I E911 service to a PSAP without receiving a request from the PSAP but, in anticipation of receiving such a request, worked with the PSAP and its service provider to complete the deployment). Where a PSAP’s request has not been fulfilled, T-Mobile has supplied the projected deployment date, and the reason(s) for delay if a PSAP’s Phase I request has not been satisfied within 6 months from the date of receipt of the request. T-Mobile’s projected deployment dates reflect its current estimate of when it should satisfy a PSAP’s request for Phase I or Phase II services; these dates,

³ NSS provides location information accurate to approximately 1000 meters or less to PSAPs. T-Mobile deployed NSS throughout its network in 2002, regardless of whether it had received a request from a PSAP for Phase II service.

⁴ T-Mobile’s plan is designed to achieve the swiftest possible deployment of Phase II equipment and services across all of T-Mobile’s markets nationally. However, as the consent decree recognizes, T-Mobile is relying on the representations of its vendors in its plans to meet the deployment schedule contained therein. See T-Mobile Consent Decree at ¶ 8(c). Further, other issues such as PSAP readiness or LEC issues may impact a carrier’s ability to deliver Phase II information to PSAPs under the consent decree.

⁵ Public Notice, *Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, CC Docket No. 94-102 (rel. June 6, 2003). T-Mobile has only included the fields for PSAPs in its licensed footprint from which it has received Phase I and Phase II requests. (T-Mobile automatically considers a request for Phase II information as incorporating a request for Phase I information.)

⁶ Note that in accordance with Paragraph 10(a) of the T-Mobile Consent Decree, for all pending Phase I and Phase II requests, T-Mobile has reported in **Attachment A** the date on which it received the particular request from the PSAP.

however, depend on external factors such as vendor performance, and PSAP and LEC readiness, and could potentially change.

Regarding the field labeled "Invalid Request" on the spreadsheet, T-Mobile has placed a "Yes" in the field to designate a PSAP's request as invalid in cases where T-Mobile: (a) currently does not have coverage in the area for which the PSAP is responsible and therefore the request is invalid under the Commission's Rules;⁷ or (b) has filed a certification with the FCC pursuant to the Richardson Recon Order.⁸ In some cases T-Mobile has not received all the documentation required under the Richardson Order⁹ to determine PSAP readiness, therefore these requests are marked as tolled per the Order. (T-Mobile has also noted where the requests are classifiable as "tolled" if received after the effective date of the Richardson Recon Order.) **With the exception of instances in which it does not have coverage, however, T-Mobile's operating policy is not to delay implementation based on questions about the validity of a particular request, but to proceed to deploy the request as much as possible.** T-Mobile does reserve the right in the future to assert the invalidity of a request, or to file a certification with the FCC regarding a particular request, should circumstances arise that warrant such action, notwithstanding the fact that it does not categorize a particular request as invalid in this Report.

II. T-Mobile Location Technology Compliance

Paragraph 10(b)(1) of T-Mobile's consent decree requires that each Quarterly Report contain a statement of whether T-Mobile's network based technology for delivering Phase II information meets the Commission's network based accuracy requirements. T-Mobile hereby reports that to date, the network-based location technology deployed for delivering E911 Phase II location information does meet the Commission's network-based accuracy requirements of 100 meters for 67 percent of calls and 300 meters for 95 percent of calls.

III. Cell Site Deployment and Activation Benchmarks

Paragraph 10(b)(2) of T-Mobile's consent decree also requires that T-Mobile's Quarterly Reports contain statements regarding whether T-Mobile has met each deployment benchmark falling due in the period immediately preceding the Quarterly Report. As reported in its November 2004 Quarterly Report, T-Mobile has satisfied the

See 47 C.F.R. § 20.18(a).

⁸ *Petition of City of Richardson*, Order on Reconsideration, CC Docket No. 94-102, 17 FCC Rcd 24282 (2002) ("Richardson Recon Order").

⁹ *Petition of City of Richardson*, Order, CC Docket No. 94-102, 16 FCC Rcd 18982 (2001) ("Richardson Order").

requirement of paragraphs 8(a)(1)-(5), including the requirement to deploy LMUs to a minimum of 8000 cell sites by February 17, 2005.

Excluding requests for areas in which T-Mobile did not provide service, only recently began providing service, or for which the PSAP had agreed to a different deployment date as of February 17, 2005, with one exception T-Mobile satisfied the requirement in paragraph (8)(a)(7) that, for requests received after April 30, 2003 but on or before February 28, 2004, it has provided a compliant Phase II service to 50% of those PSAPs' coverage areas or population by no later than February 17, 2005. With respect to the Phase II request for Charlottesville, VA, due to an internal delay in recognizing and properly routing that request, T-Mobile did not deploy 50% by February 17, 2005; importantly, however, that request was 100% deployed as of May 2, 2005, ahead of the Consent Decree's deadline for 100% deployment.

Finally, in accordance with Paragraph 8(a)(8) of the consent decree, T-Mobile is providing Phase II service to at least 50% of PSAPs' coverage areas or population within six months of receipt of request for all PSAPs that requested service after February 28, 2004, with the exception of areas in which T-Mobile does not provide service, only recently began providing service, or for which the PSAP has agreed to a different deployment date. For a majority of these requests, in fact, T-Mobile provided Phase II service to 100% of those PSAPs' coverage areas or population, well ahead of the deadline of 15 months from the date of the request, as provided under paragraph 8(a)(8) of the consent decree.

IV. NSS/E-OTD

Pursuant to paragraph 10(b)(10) of T-Mobile's consent decree, T-Mobile confirms that it continues to provide NSS location information to PSAPs for all deployments that were receiving and utilizing such location information as of the Effective Date of the decree (the sole exception being those instances in which PSAPs have agreed to migrate from NSS as they transition to TDOA service).¹⁰ Further, T-Mobile has completely de-commissioned E-OTD and is providing TDOA location information to those PSAPs previously receiving E-OTD information.

¹⁰ For PSAPs already receiving Phase II TDOA service, NSS information is not being provided.

Finally, included with this letter is a declaration from an officer of T-Mobile attesting to the truth and accuracy of this Report, pursuant to Paragraph 10 (c) of T-Mobile's consent decree. T-Mobile is serving this Report on the Executive Directors and counsel for the Association of Public-Safety Communications Officials-International, Inc., the National Emergency Number Association, and the National Association of State Nine One One Administrators, as provided for in the decree. Please contact the undersigned should there be further questions.

Respectfully submitted,



Robert A. Calaff
Director – Federal Policy

Attachment

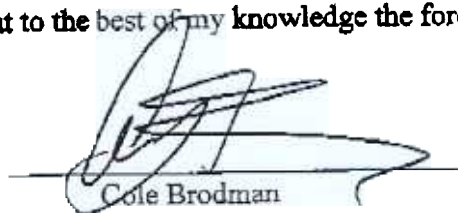
cc: David Solomon, Chief, Enforcement Bureau
Catherine Seidel, Acting Chief, Wireless Telecommunications Bureau
John Newman, Executive Director, APCO
Bill Cade, 9-1-1 Director, APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel, NENA
Steve Marzolf, President, NASNA

Sam Feder, Office of Chairman Martin
John Branscome, Office of Commissioner Abernathy
Paul Margie, Office of Commissioner Copps
Barry Ohlson, Office of Commissioner Adelstein
Nicole McGinnis, Wireless Telecommunications Bureau
Michael Wilhelm, Wireless Telecommunications Bureau
David Siehl, Wireless Telecommunications Bureau
Lisa Fowlkes, Enforcement Bureau
Katherine Berthot, Enforcement Bureau

DECLARATION OF COLE BRODMAN

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on May 2, 2005

A handwritten signature in black ink, appearing to read 'Cole Brodman', is written over a light blue rectangular background. The signature is stylized with a large, sweeping 'C' and 'B'.

Cole Brodman
Senior Vice President,
Product & Systems Development,
Chief Development Officer
T-Mobile USA, Inc.
12920 S.E. 38th Street
Bellevue, WA 98006